

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 13-10903TPA
	:	
WILLIAM JAMES SMATHERS AND	:	
CARRIE ELIZABETH SMATHERS, HIS	:	HON. THOMAS P. AGRESTI
WIFE,	:	
Debtors	:	
	:	CHAPTER 13
PNC BANK,	:	
Movant,	:	RELATED TO CLAIM NO. 15
	:	
v.	:	
	:	
WILLIAM JAMES SMATHERS AND	:	
CARRIE ELIZABETH SMATHERS, HIS	:	
WIFE; and RONDA J. WINNECOUR,	:	
ESQUIRE, CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,
INC.

BY: /s/Michael S. JanJanin
Michael S. Jan Janin, Esquire
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Counsel for Debtors, William James Smathers and
Carrie Elizabeth Smathers

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WIFE; and RONDA J. WINNECOUR, :
ESQUIRE, CHAPTER 13 TRUSTEE, :
Respondents.

CERTIFICATE OF SERVICE OF DECLARATION

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on June 15, 2018.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification via the CM/ECF System.

Ronda J. Winnecour, Esquire, Chapter 13 Trustee
cmecf@chapter13trusteedpa.com

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: June 15, 2018

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,
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